

JAN 19 1989

For Six Month Period Ending _____

(Insert date)

Name of Registrant **Sontheimer Hazlett, Ltd. also D/B/A Sontheimer Group, also through Mallory Factor Inc. St. Maarten Tourist Info. office & Bonaire Tourist Bureau.**
Registration No. **1648**
Business Address of Registrant **275 Seventh Avenue
New York, NY 10001**

I—REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

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4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☐ N/A

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☐

No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

9. Have you acquired any new foreign principal¹ during this 6 month reporting period?

Yes ☐

No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Registrant is engaged as P/R's counsel in the United States for the purpose of promoting tourism on the islands of St. Maarten, Saba, St. Eustasius & Bonaire.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
Amortized over six month period	Gov't of Island Territory the Windward section St. Maarten	Payment for NY office suite for tourism & svces. rendered on behalf of the tourism office	\$104,260
Amortized over six month period	Bonaire Gov't	Same as above	\$ 91,000
Total			\$195,260

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).
⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS—MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal. Gov't of Island Territory, Windward Island section of St. Maarten & Bonaire.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
	See schedule I (attached)		

 Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following: N/A

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups: N/A

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda:

☐ English N/A ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? N/A Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐ N/A

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? N/A Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐
Exhibit B⁷ Yes ☐ No ☐

N/A

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

(Type or print name under each signature)

Yvonne Nichie

Yvonne Nichie

Subscribed and sworn to before me at 275 Seventh Avenue NY, NY 10001

this 22nd day of February, 19 89

LORI SILBERGER
Notary Public, State of New York
No. 4924600
Qualified in Nassau County
Commission Expires 4/93

Lori Silberger

(Signature of notary or other officer)

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

DATE	VENDOR	PURPOSE	AMOUNT
07/22	Petty Cash	PR	119.00
07/27	Burrelles	PR	230.18
07/27	Copycare	PR	311.76
07/27	DHL	PR	255.65
07/27	Federal Express	PR	49.25
07/27	Freeman Companies	PR	80.00
07/27	Luce Press Clippings	PR	329.46
07/27	Sabra Limousine Svc.	PR	33.00
07/27	UPS	PR	147.34
07/27	Western Union	PR	127.22
08/02	Marine Midland	PR	1,000.00
08/03	Brody & Weiss	PR	350.00
08/03	Manhattan Couriers	PR	15.00
08/03	Sabra Limousine	PR	48.40
08/10	Manhattan Courier	PR	15.00
08/10	UPS	PR	23.93
08/10	Bic Pac	PR	119.00
08/17	UPS	PR	6.50
08/18	G. Knopfler	PR	300.00
08/18	American Air Freight	PR	93.75
08/24	Manhattan Couriers	PR	54.00
08/24	Mechanicals	PR	30.00
08/24	UPS	PR	3.44
08/30	Marine Midland Bank	PR	1,000.00
08/30	BicPac	PR	64.00
08/31	Copycare	PR	373.46
08/31	DHL	PR	90.35
08/31	HSMAI	PR	240.00
08/31	HSMAI	PR	295.00
08/31	Luce Press Clippings	PR	344.18
08/31	Conde Naste	PR	27.97
08/31	UPS	PR	13.79
09/07	Brody & Weiss	PR	350.00
09/07	Manhattan Couriers	PR	10.00
09/07	UPS	PR	12.07
09/14	Bic Pac	PR	34.00
09/14	Mechanicals	PR	75.00
09/14	UPS	PR	38.98
09/14	Petty Cash	PR	6.26
09/28	Bacon's Publishing Co.	PR	146.00
09/28	Copycare	PR	482.79
09/28	DHL	PR	114.00
09/28	Manhattan Couriers	PR	21.00
10/05	Brody & Weiss	PR	350.00
10/05	Petty Cash	PR	19.35
10/05	Burrelles	PR	213.78
10/05	Federal Express	PR	34.00
10/05	Manhattan Couriers	PR	35.00

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DATE	YENDOR	PURPOSE	AMOUNT
10/05	Sabra Car & Limousine	PR	56.80
10/05	UPS	PR	62.03
10/12	Bic Pac	PR	29.00
10/12	DHL	PR	678.49
10/12	News Events Photo	PR	141.50
10/12	UPS	PR	109.27
10/19	Burrelles	PR	203.28
10/19	Federal Express	PR	24.00
10/19	Luce Press Clippings	PR	318.79
10/19	UPS	PR	49.95
10/24	G. Knopfler	PR	350.00
10/27	Burrelles	PR	211.68
10/27	DHL	PR	27.75
10/27	L&L Limousine	PR	57.45
10/27	Luce Press Clippings	PR	391.04
10/27	Manhattan Couriers	PR	140.00
10/27	UPS	PR	24.21
11/03	Petty Cash	PR	47.13
11/03	Copycare	PR	186.19
11/03	DHL	PR	57.00
11/03	Larimi Publications	PR	350.00
11/09	UPS		59.69
11/09	Brody & Weiss	PR	350.00
11/09	Federal Express	PR	24.00
11/09	Technisphere	PR	128.01
11/16	L&L Limousine	PR	944.00
11/16	UPS	PR	65.97
11/23	ASTA	PR	250.00
11/23	Kurt Mayer Photorama	PR	133.28
11/23	Bic Pac	PR	58.00
11/30	Brody & Weiss	PR	350.00
11/30	Burrelles	PR	221.13
11/30	Luce Press Clippings	PR	414.16
11/30	UPS	PR	17.92
11/30	Video Monitoring Svc	PR	387.38
12/07	DHL	PR	27.75
12/07	Federal Express	PR	62.25
12/07	Towle Silversmiths	PR	215.56
12/07	UPS	PR	59.18
12/07	Manhattan Couriers	PR	83.00
12/15	Brody & Weiss	PR	350.00
12/15	Federal Express	PR	145.00
12/15	Scarlets Flower Shop	PR	40.00
12/15	UPS	PR	12.32
12/22	Copycare	PR	205.27
12/22	L&L Limousine	PR	224.00
12/22	Manhattan Couriers	PR	14.00
12/22	UPS	PR	75.39

DATE	VENDOR	PURPOSE	AMOUNT
12/28	Marine Midland	PR	1,000.00
12/28	Bic Pac	PR	29.00
12/28	Burrelles	PR	877.17
12/28	DHL	PR	382.85
12/28	Luce Press Clippings	PR	490.28
12/28	New York Times	PR	14.00
12/28	UPS	PR	290.96
12/28	Manhattan Couriers	PR	79.25
01/11	DHL	PR	133.45
01/11	Brody & Weiss	PR	350.00
01/11	UPS	PR	13.12
01/11	Video Monitoring Svc.	PR	255.15
01/18	United Exposition Svc.	PR	151.00
01/18	Kurt Mayer Photorama	PR	329.50
01/18	Manhattan Couriers	PR	81.50
01/18	Manhattan Couriers	PR	5.75
01/18	New York Times	PR	288.50
01/18	Bacon's Media Alerts	PR	140.00

TOTAL FOR 7/20/88-1/19/89

21,471.15

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Yvonne Nichie
Signature

Feb 22, 1989
Date

Yvonne Nichie

Please type or print name of signatory on the line above

President, Sontheimer Group
Title

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